

EXHIBIT D

**IN THE DISTRICT COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. CROIX**

PETRO INDUSTRIAL SOLUTIONS, LLC,

Plaintiff,

v.

ISLAND PROJECT AND OPERATING SERVICES, LLC;
VITOL US HOLDING II CO.; VITOL VIRGIN ISLANDS
CORP.; ANDREW CANNING; and OPTIS EUROPE, LTD.,

Defendants.

Civil No. 1:21-CV-00312

**DECLARATION OF CARL A. BECKSTEDT III, ESQ. IN SUPPORT OF
MOTION FOR ADMISSION *PRO HAC VICE* OF SARAH HANNIGAN, ESQ.**

I, Carl A. Beckstedt III, Esq., hereby declare under penalty of perjury that the following is true and correct:

1. I am an active member in good standing of the V.I. Bar Association, having been an active member of the V.I. Bar since 1998.
2. I am local counsel for the Defendants Vitol Virgin Islands Corp. and Vitol US Holding Co. (collectively, the “Vitol Defendants”).
3. The Vitol Defendants have requested that Sarah Hannigan, Esq., participate fully in the preparation and trial of this case.
4. Sarah Hannigan, Esq. is an attorney with the law firm Susman Godfrey LLP in New York.
5. For reasons set forth herein and in Sarah Hannigan’s Declaration and Application, I hereby recommend the admission *pro hac vice* of Sarah Hannigan, Esq. subject to compliance with the Court Rules.

Dated: April 5, 2023

s/ Carl A. Beckstedt III
Carl A. Beckstedt III, Esq.